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6 The Honorable Robert S. Lasnik  
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10 UNITED STATES DISTRICT COURT  
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12 WESTERN DISTRICT OF WASHINGTON  
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15 JOSE MONTES OPICO,  
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18 Plaintiff,  
19 v.  
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21 CONVERGENT OUTSOURCING, INC.,  
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24 Defendant.  
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27 Case No. 2:18-cv-01579-RSL  
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29 **SECOND JOINT STIPULATION TO  
30 CONTINUE TRIAL AND RELATED  
31 DEADLINES**

32 **NOTE FOR MOTION DOCKET:**  
33 March 3, 2020  
34

35 Plaintiff Jose Montes Opico (“Plaintiff”) and Defendant Convergent Outsourcing,  
36 Inc. (“Defendant”), through their respective counsel of record, hereby stipulate and  
37 jointly move the Court to amend the Amended order Setting Trial and Related Dates  
38 (Dkt #40), entered on November 14, 2019 based on the following stipulation:

39 WHEREAS, Plaintiff and Defendant each have cross-motions for summary  
40 judgment pending (Dkt. #25 and #34);

41 WHEREAS, trial in this action is currently set for May 4, 2020;

42 WHEREAS, the pre-trial deadlines are approaching in April 2020;

43 WHEREAS, the parties anticipate that the Court’s ruling on the cross-motions for  
44 summary judgment will narrow the issues in this case, and may dispose of this case in its

45 SECOND JOINT STIPULATION  
46 TO CONTINUE TRIAL AND  
47 RELATED DEADLINES - 1  
48 Case No. 2:18-cv-01579-RSL

49 Donald G. Grant, P.S.  
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1 entirety;

2 WHEREAS, the parties mutually agree that postponing trial and all pre-trial  
3 deadlines until after the Court rules on the parties' cross-motions for summary judgment  
4 will conserve the resources of the parties and the Court;

5 WHEREFORE, it is hereby stipulated and agreed by the parties that trial and the  
6 accompanying deadlines be continued as follows:

<u>Matter</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
All motions in limine must be filed by and noted on the motion calendar no earlier than the second Friday thereafter. Replies will be accepted.	April 6, 2020	July 7, 2020
Agreed pretrial order due	April 22, 2020	July 24, 2020
Trial briefs and trial exhibits due	April 29, 2020	July 28, 2020
Trial Date	May 4, 2020	August 3, 2020

22 [SIGNATURE PAGE FOLLOWS]  
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SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 2  
Case No. 2:18-cv-01579-RSL

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1 IT IS SO STIPULATED.  
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3

DATED: March 3, 2020

4  
5 DONALD G. GRANT, P.S.  
6  
7

*/s/ Donald G. Grant*  
8 DONALD G. GRANT, WSBA#15480  
9 Of Counsel for Defendant Convergent  
10 Outsourcing, Inc.

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14 DATED: March 3, 2020  
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SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 3  
Case No. 2:18-cv-01579-RSL

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~~PROPOSED ORDER~~

Upon consideration of the stipulation submitted by the parties and good cause appearing therefor, the Court orders that the Scheduling Order is amended as follows:

<u>Matter</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
All motions in limine must be filed by and noted on the motion calendar no earlier than the second Friday thereafter. Replies will be accepted.	April 6, 2020	July 7, 2020
Agreed pretrial order due	April 22, 2020	July 24, 2020
Trial briefs and trial exhibits due	April 29, 2020	July 28, 2020
Trial Date	May 4, 2020	August 3, 2020

IT IS SO ORDERED.

DATED: March 6, 2020

  
The Hon. Robert S. Lasnik

SECOND JOINT STIPULATION  
TO CONTINUE TRIAL AND  
RELATED DEADLINES - 4  
Case No. 2:18-cv-01579-RSL

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